

January 14, 2025

VIA ECF

The Honorable J. Brendan Day  
United States Magistrate Judge  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: *MacLean et al. v. Wipro Limited*, No. 3:20-cv-03414 (GC) (JBD)**  
**Joint Request to Extend Deadline to File Joint Letter Setting Forth the Parties' Positions**  
**Regarding Any Outstanding Custodian Disputes**

Dear Judge Day:

Plaintiffs Gregory MacLean, Rick Valles, Ardeshir Pezeshki, James Gibbs, and Ronald Hemenway and Defendant Wipro Limited write jointly to request a 10-day extension to the January 17, 2025 deadline for the parties to file a joint letter setting forth their positions regarding any outstanding disputes concerning ESI custodians. *See* Order (Dkt. 84) (ordering parties to meet and confer and to submit a joint letter to the extent custodian disputes remain). Since the Court entered its Order on December 19, 2024, the parties have exchanged further proposals on the custodian issue, and are continuing to meet and confer. In light of the parties' ongoing negotiations, the parties respectfully request a 10-day extension to the current deadline for the joint letter—extending that deadline to January 27, 2025. This extension would give the parties the opportunity to continue their negotiations regarding the custodian dispute, which may avoid unnecessary briefing if the parties are able to resolve their dispute. The proposed extension would not impact any other scheduled dates or deadlines in this matter.

If the above proposed extension is acceptable to Your Honor, the parties respectfully request that this correspondence be "So Ordered" and entered on the docket.

We thank Your Honor for his attention to this matter.

Respectfully submitted,

/s/ Jonathan Rudnick  
Jonathan Rudnick  
Daniel Kotchen (*pro hac vice*)

/s/ Seton O'Brien Hartnett  
Seton O'Brien Hartnett  
Greta Williams (*pro hac vice*)

*Attorneys for Plaintiffs and Putative Class*

*Attorneys for Defendant Wipro Limited*

CC: All counsel of record via CM/ECF.

**SO ORDERED this \_\_\_\_ day of January,  
2025**

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**Hon. J. Brendan Day  
United States Magistrate Judge**